



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

JUN 3 2004

400 Seventh St., S.W.  
Washington, D.C. 20590

Mr. Eugene J. Secor  
EHS/Transportation Specialist  
H.B. Fuller Company  
31601 Research Park Drive  
Madison Heights, MI 48306

Ref. No. 04-0123

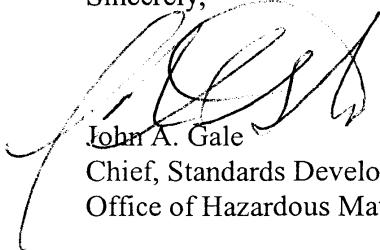
Dear Mr. Secor:

This is in response to your May 5, 2004 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to package orientation arrows. Specifically, you ask whether the orientation arrows preprinted on your non-specification fiberboard boxes used for limited quantities of hazardous materials as shown in your accompanying photograph meet the requirements of § 172.312 of the HMR.

The answer is no. Section 172.312 of the HMR requires each non-bulk combination package having inner packagings containing liquid hazardous materials be legibly marked, with package orientation markings that conform pictorially to the illustration shown in this section, on two opposite vertical sides of the package with the arrows pointing in the correct upright direction. Depicting a rectangular border around the arrows is optional. The package orientation arrows as displayed on your fiberboard boxes in your photograph do not conform pictorially to the illustration in § 172.312.

I hope this information is helpful.

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



040123

172.312(a)(2)

to Foster  
§172.312(a)(2)  
Markings  
04-0123



**H.B. Fuller Company**

May 5, 2004

US DEPARTMENT OF TRANSPORTATION  
RSPA  
STANDARDS DEVELOPMENT, DHM-11  
400 SEVENTH STREET., SW  
WASHINGTON, DC 20590-0001

Re: Orientation Arrows

Gentlemen:

During a recent internal DOT audit, the question arose over whether the "Orientation Arrows" preprinted on non-specification fiberboard boxes used for Limited Quantities meet the requirements of 49 CFR 172.312(a)(2) which states "Legibly marked, with package orientation markings which conform pictorially to the illustration shown in this paragraph ...". A photograph is attached to illustrate the question. In this case there is no baseline on which the arrows stand and the arrows are spaced far apart, roughly 4 to 5 inches. These markings do appear on two opposite sides of the carton. I do not believe these meet the requirements of the regulation; as such I am asking for the Departments official position on this matter.

As always, the Departments assistance is much appreciated; an expeditious written reply would be most helpful. I can be reached at 248-526-4783 during working hours.

BEST REGARDS,

EUGENE J. SECOR  
EHS/TRANSPORTATION SPECIALIST

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